

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11

Case No.
08-13555 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

1ST ADVANTAGE MORTGAGE, L.L.C. *et al.*,

Defendants.

Adversary Proceeding
No. 16-01019 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

GUILD MORTGAGE COMPANY,

Defendant.

Adversary Proceeding
No. 17-01001 (SCC)

STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES

WHEREAS, to promote the efficient resolution of the claims and disputes, on November 1, 2016, this Court entered a case management order (the “CMO”), which governs the above-referenced actions;

WHEREAS, pursuant to the CMO, defendants were permitted to file letters requesting a pre-motion conference to file “motions under Fed. R. Civ. P. 12(b)(2) (lack of personal

jurisdiction); 12(b)(4) (improper process); 12(b)(5) (insufficient service of process); and 28 U.S.C. § 1404 (change of venue),” (the “Letter Requests”) (CMO ¶ 15);

WHEREAS, on January 24, 2017, Guild Mortgage Company (“Guild”) filed a Letter Request to file a motion on the basis that it was improperly named because it was not a successor in interest [Case No. 17-01001, ECF No. 9];

WHEREAS, on April 12, 2017, Lehman Brothers Holdings Inc. (“LBHI”) filed a response to Guild’s Letter Request proposing a discovery schedule for the parties to engage in prior to consideration of any motion on the basis that a defendant was not a successor in interest [Case No. 16-01019, ECF No. 419];

WHEREAS, on October 5, 2017, this Court entered a scheduling order regarding discovery and briefing in connection with certain defendants’, including Guild’s, motion to dismiss based on successor liability issues [Case No. 16-01019, ECF No. 520] (the “Discovery Scheduling Order”); and

WHEREAS, on January 25, 2018, this Court entered an Order extending discovery deadlines (“Order Extending Discovery Deadlines”) [Case No. 16-01019, ECF No. 558 and Case No. 17-01001, ECF No. 39].

IT IS HEREBY STIPULATED AND AGREED, by and between LBHI and Guild, by their respective undersigned counsel, as follows:

1. The remaining deadlines set forth in the Order Extending Discovery Deadlines are hereby extended for an additional 30 days.
2. The terms of the Discovery Scheduling Order as to any other defendant are otherwise unchanged.

Dated: March 19, 2018

ROLLIN BRASWELL FISHER LLC

By: /s/ Maritza Dominguez Braswell
Michael A. Rollin
Maritza Dominguez Braswell (pro hac vice)
Caleb Durling
Corey J. Longhurst (pro hac vice)
8350 E. Crescent Pkwy., Suite 100
Greenwood Village, Colorado 80111
Telephone: (303) 945-7415
Facsimile: (303) 974-7468
mrollin@rbf.law
mbraswell@rbf.law
cdurling@rbf.law
clonghurst@rbf.law

-and-

WOLLMUTH MAHER & DEUTSCH LLP
William A. Maher
James N. Lawlor
Adam M. Bialek
Mara R. Lieber
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
wmaher@wmd-law.com
jlawlor@wmd-law.com
abialek@wmd-law.com
mlieber@wmd-law.com

Counsel for Lehman Brothers Holdings Inc.

IT IS SO ORDERED: March __, 2018

HON. SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

INCORVAIA & ASSOCIATES

By: 
G. Ehrich Lenz (pro hac vice)
Joel L. Incorvaia (pro hac vice)
1947 Camino Vida Roble, Suite 230
Carlsbad, California 92008-6540
Telephone: (858) 259-2220
Facsimile: (858) 259-3131
Ehrich@Incorlaw.com
Joel@Incorlaw.com

Counsel for Guild Mortgage Company